

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 17-11811
Joseph Zwicharowski	:	Chapter 13
	:	Judge Magdeline D. Coleman
Debtor(s)	:	*****
	:	
Wells Fargo Bank, N.A.	:	
	:	
Movant,	:	
vs	:	
	:	
Joseph Zwicharowski	:	
	:	
William C. Miller	:	
Respondents.	:	

**WELLS FARGO BANK, N.A. 'S NOTICE OF DEBTOR'S REQUEST FOR
FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Wells Fargo Bank, N.A. ("Creditor") by and through undersigned counsel, hereby submits Notice to the Court of Joseph Zwicharowski ("Debtor") request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor has requested a forbearance period of 3 months and has elected to not tender payments to Creditor that would have come due on the mortgage starting April 1, 2020 through June 1, 2020, and will resume payments beginning July 1, 2020. Creditor holds a secured interest in the real property commonly known as 3281 Red Lion Road, Philadelphia, PA 19114. Creditor filed a proof of claim as claim number 5.

Creditor does not waive any rights to collect the payments that come due during the forbearance period. Debtor will be required to cure the delinquency created by the forbearance period. If Debtor fails to make arrangements to fully cure any arrears resulting from the

forbearance period, Creditor reserves the ability to seek relief from the automatic stay upon expiration of the forbearance period.

Respectfully submitted,

/s/ Sarah E. Barngrover

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is kvelter@manleydeas.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: :
: **Case No.: 17-11811**
Joseph Zwicharowski : **Chapter 13**
: **Judge Magdeline D. Coleman**
Debtor(s) : * * * * *
:
Wells Fargo Bank, N.A. :
:
Movant, :
vs :
:
Joseph Zwicharowski :
:
William C. Miller :
Respondents. :

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Wells Fargo Bank, N.A.'s Notice of Debtor's Request for Forbearance Due to the COVID-19 Pandemic was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

William C. Miller, Chapter 13 Trustee, Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105, ecfemails@ph13trustee.com

Brad J. Sadek, Attorney for Joseph Zwicharowski, Sadek and Cooper, 1315 Walnut Street, Suite 502, Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on June 12, 2020:

Joseph Zwicharowski, 3982 Carteret Drive, Philadelphia, PA 19114

Joseph Zwicharowski, 3281 Red Lion Road, Philadelphia, PA 19114

TD Bank North, Attn: Bankruptcy, P.O. Box 1190, Lewston, ME 04243

DATE: 6/12/2020

/s/ Sarah E. Barngrover

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is kvelter@manleydeas.com